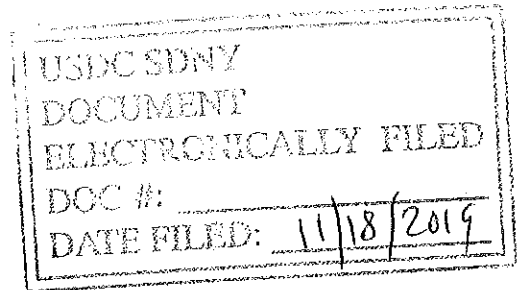


VERNER SIMON

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November 13, 2019



VIA ECF

Hon. Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1610
New York, NY 10007

Re: *Lebetkin v Giray et al.*
Case No.: 18-cv-8170

Dear Judge Cote:

MEMO ENDORSE

As Plaintiff's counsel, pursuant to your Individual Rule 4., a., I have delivered my **Exhibit A** which accompanies my pre-Motion letter to re-open discovery and to re-open Defendant Giray's deposition. **Exhibit A**, a letter I received from an inmate in the West Palm Beach Detention Center charging Defendant with criminal conduct, would seem to be a document which should not be filed on any public record until the truth of statements made therein has been established. Toward that end, I seek an Order and commission to depose the incarcerated sender on issues relevant to this civil proceeding. The basis for my request has been set out in the pre-motion letter which has been efiled.

Thank you for your time and consideration of the issue presented.

Very truly yours,
VERNER SIMON

A handwritten signature in black ink, appearing to read "Paul Verner".

PAUL VERNER

*The request to seal is
granted.*

*Denise Cote
11/18/19*